

Message

From: Natalie Nowiski [NNowiski@slb.com]
Sent: 11/18/2020 12:12:26 AM
To: Ho, Yenhung [Ho.Yenhung@epa.gov]; Albright, David [Albright.David@epa.gov]
CC: 'Rebecca Hollis' [rhollis@cleanenergysystems.com]; Shari.Ring@cadmusgroup.com; Vivian Rohrback [VRohrback@slb.com]
Subject: RE: [Ext] RE: Technical Response #2 - Inquiry

Thanks, Calvin for your email and the feedback.

Hope you have a nice evening!

Best regards,
Natalie

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Tuesday, November 17, 2020 5:31 PM
To: Natalie Nowiski <NNowiski@slb.com>; Albright, David <Albright.David@epa.gov>
Cc: 'Rebecca Hollis' <rhollis@cleanenergysystems.com>; Shari.Ring@cadmusgroup.com
Subject: RE: [Ext] RE: Technical Response #2 - Inquiry

Hi Natalie,

We wanted to follow up with your questions about the risk assessment process for a Class VI permit application.

The Class VI program doesn't have specific requirements for a risk assessment process. We think overall that the quantitative assessment CES is developing is acceptable at this time (in particular because it is site-specific and based on planned operations) and suggest that CES complete the assessment. CES may use NRAP tools if you choose to evaluate risks, such as induced/natural seismicity and fluid (e.g., CO2) leakage to USDWs at the site.

If needed, we will make specific comments and/or request for additional information on the risk register as part of our review of the updated Emergency and Remedial Response Plan that CES submitted.

Hope this helps. Let us know if you have more questions.

Best regards,
Calvin

From: Natalie Nowiski <NNowiski@slb.com>
Sent: Wednesday, October 28, 2020 5:36 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; Albright, David <Albright.David@epa.gov>
Cc: 'Rebecca Hollis' <rhollis@cleanenergysystems.com>; Shari.Ring@cadmusgroup.com
Subject: RE: [Ext] RE: Technical Response #2 - Inquiry

Hi Calvin,

Thank you for your email. I believe that time slot should work for my team. Will send the invite shortly.

Hope you have a nice evening!

Best regards,
Natalie

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Tuesday, October 27, 2020 5:17 PM
To: Natalie Nowiski <NNowiski@slb.com>; Albright, David <Albright.David@epa.gov>
Cc: 'Rebecca Hollis' <rhollis@cleanenergysystems.com>; Shari.Ring@cadmusgroup.com
Subject: [Ext] RE: Technical Response #2 - Inquiry

Hi Natalie,

The EPA team is available to talk with CES next Friday (11/6), between 1pm and 2pm PST. Please send an invite to David, Shari, and me if the time slot works for your team

Best regards,
Calvin

Calvin Ho
Groundwater Protection Section
Water Division (WTR-4-2)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3262

From: Natalie Nowiski <NNowiski@slb.com>
Sent: Tuesday, October 27, 2020 11:35 AM
To: Albright, David <Albright.David@epa.gov>; Ho, Yenhung <Ho.Yenhung@epa.gov>
Cc: 'Rebecca Hollis' <rhollis@cleanenergysystems.com>
Subject: Technical Response #2 - Inquiry

Dear Calvin and David,

Hope you are both doing well. CES is in the process of finalizing the response to the Technical Evaluation Comments and Information Request #2, which will be submitted by October 31, 2020.

In Enclosure #1, EPA recommended that, *“for each scenario, the following be identified: severity of the impact, likelihood of the event; timing of the event; avoidance measures in place to reduce the likelihood of the event; detection methods that reflect planned testing and monitoring; response personnel; and equipment.”* As part of the response, the attached draft of the Project Risk Registrar was prepared to address these issues.

Can you please review and confirm whether the values of the “likelihood” and “severity” are acceptable at this time, or whether EPA would prefer that the values be separated into different categories (ie. Injury/Fatality; amount of damage; impact on project, etc.) for the scenarios that are identified. Please note that the analysis is preliminary given the stage of the project, and will be need to be updated, expanded upon and re-performed as more data becomes available.

Finally, would it be possible to arrange a telephone call next week to discuss questions regarding the risk assessment scenario process in general for Class VI Permitting Applications? We note that there are many different tools that can be utilized to perform these risk assessments, some which utilize a qualitative approach, and others which are quantitative or semi quantitative in nature. We were hoping to obtain further information and guidance as to which methodologies are best suited / preferred by the EPA for Class VI Permitting.

Please let me know if you have any questions or require further clarification.

Best regards,
Natalie

Natalie Nowiski

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